

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JUDGE COFF

- - - - - x  
UNITED STATES OF AMERICA :  
 :  
 - v. - :  
 :  
GRIGORY SHINDER, and :  
ALBERT SHINDER, :  
 :  
Defendants. :  
- - - - - x

INDICTMENT

14 Cr.

14 CRIM 623

COUNT ONE

(Mail and Wire Fraud Conspiracy)

The Grand Jury charges:

1. From at least in or about 2007, through and including in or about August 2010, in the Southern District of New York and elsewhere, GRIGORIY SHINDER and ALBERT SHINDER, the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated and agreed together and with each other to commit mail fraud and wire fraud in violation of Title 18, United States Code, Sections 1341, and 1343.

2. It was a part and object of the conspiracy that GRIGORIY SHINDER and ALBERT SHINDER, the defendants, and others known and unknown, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice and attempting so to

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do, would and did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service, and would and did deposit and cause to be deposited a matter and thing to be sent and delivered by a private and commercial interstate carrier, and take and receive therefrom, such matter and thing, and knowingly caused to be delivered by mail and such carrier according to the direction thereon, and at the place at which it was directed to be delivered by the person to whom it was addressed, any such matter and thing, in violation of Title 18, United States Code, Section 1341.

3. It was further a part and an object of the conspiracy that GRIGORIY SHINDER and ALBERT SHINDER, the defendants, willfully and knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, a writing, sign, signal, picture, and sound for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349).

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One of this Indictment, GRIGORIY SHINDER and ALBERT SHINDER, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offense.

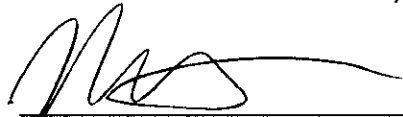
Substitute Assets Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

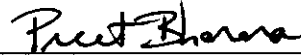
- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C.  
§ 853(p), to seek forfeiture of any other property of said defendants  
up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981 and  
Title 28, United States Code, Section 2461)



FOREPERSON



PREET BHARARA   
United States Attorney

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UNITED STATES OF AMERICA

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(18 U.S.C. § 1349.)



Foreperson.

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9/17/14 Fld. Indictment, Case assigned to Judge Core.

Pitman, USMS

(Bk)